## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF PENNSYLVANIA

IN RE: John A D'Andrea, Jr

Debtor.

CASE NO.: 19-10865-elf

CHAPTER 13

SN Servicing Corporation as servicer for U.S. Bank Trust

National Association, as Trustee of

Chalet Series III Trust

JUDGE: Eric L. Frank

**HEARING DATE:** 

November 3, 2020 at 9:30 am

Movant

v.

OBJECTION DEADLINE:

October 22, 2020

John A D'Andrea, Jr, Christina M. D'Andrea - Co-Debtor William C. Miller - Trustee Respondents.

## NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY AND RELIEF FROM THE CO-DEBTOR STAY

SN Servicing Corporation as servicer for U.S. Bank Trust National Association, as Trustee of Chalet Series III Trust has filed a Motion for Relief from Stay and for Co-Debtor Relief from Stay with the Court in order to gain Court authority to foreclose on real property known as 26 Cliff Road, Levittown, PA 19057.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

- 1. If you do not want the Court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before October 22, 2020 (14 days after the date the notice was mailed) you or your attorney must do all of the following:
  - (a) file an answer explaining your position at

Clerk of Court
United States Bankruptcy Court
Robert N.C. Nix, Sr. Federal Courthouse
900 Market Street, Suite 400
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorney:

Lorraine Gazzara Doyle Friedman Vartolo, LLP 1325 Franklin Avenue, Suite 230 Garden City, NY 11530 T: (212) 471-5100 F: (212) 471-5150

Bankruptcy@FriedmanVartolo.com

- 2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
- 3. A hearing on the motion is scheduled to be held before the Honorable Eric L. Frank on November 3, 2020 at 9:30 am at Robert N.C. Nix Sr. Federal Courthouse, 900 Market Street, Philadelphia, PA 19107.
- 4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been canceled because no one filed an answer.

Dated: October 8, 2020

By: <u>/s/Lorraine Gazzara Doyle</u>

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TO:

John A D'Andrea, Jr 26 Cliff Road Levittown, PA 19057 **Debtor**  Christina M. D'Andrea 26 Cliff Road Levittown, PA 19057 *Co-Debtor and Co-Mortgagor* 

Brad J. Sadek Sadek and Cooper 1315 Walnut Street Suite 502 Philadelphia, PA 19107 **Debtor's Attorney** 

William C. Miller, Esq. Chapter 13 Trustee P.O. Box 1229 Philadelphia, PA 19105 *Trustee* 

United States Trustee Office of the U.S. Trustee 200 Chestnut Street Suite 502 Philadelphia, PA 19106 *U.S. Trustee*